

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEVADA**

**COMPLAINT**  
**(Jury Demanded)**

Plaintiff is a resident of Clark County, Nevada and at all times herein was employed by Defendant at its Las Vegas, Nevada Dollar Rent A Car business. Defendant DTG OPERATIONS, INC. is a foreign corporation which owns and operates the Dollar Rent A Car business which employed Plaintiff.

III.

Plaintiff was employed by Defendant in 2005. In 2007 Plaintiff became pregnant while working for Defendant and she was subjected to different treatment, harassment and termination because of her pregnancy. Plaintiff filed a charge of discrimination with the EEOC, a copy of which is attached hereto and the facts set forth therein are hereby incorporated by reference. Plaintiff has received a right to sue letter based upon that charge, and it is also attached hereto. This lawsuit has been filed within 90 days from Plaintiff's receipt of that letter.

IV.

The above described acts of Defendant were wanton, willful, malicious and done with a conscious disregard for Plaintiff's federally protected rights.

V.

Plaintiff has suffered emotional distress, physical harm and emotional distress related to that physical harm, and financial loss as a direct result of the illegal conduct identified above.

WHEREFORE, Plaintiff prays for the following relief:

1. Reinstatement, with full backpay, seniority, benefits and prejudgment interest;
2. Frontpay, if reinstatement is not possible;
3. Compensatory damages in the amount of \$300,000;
4. Punitive damages in the amount of \$300,000;
5. Attorney's fees and costs of suit; and
6. Such other and further relief as the Court may wish to entertain.

DATED this 19<sup>th</sup> day of September, 2009.

  
\_\_\_\_\_  
RICHARD SEGERBLOM, ESQ.  
704 South Ninth Street  
Las Vegas, Nevada 89101  
Attorney for Plaintiff



EEOC Form 5 (5/01)

**CHARGE OF DISCRIMINATION**

This form is affected by the Privacy Act of 1974. See enclosed Privacy Act Statement and other information before completing this form.

Charge Presented To:

Agency(ies) Charge No(s):

☒ FEPA

0305-08-0160L

☒ EEOC**34B-2007-01582****Nevada Equal Rights Commission**

and EEOC

State or local Agency, if any

THE PARTICULARS ARE (If additional paper is needed, attach extra sheet(s)):

because I did not tuck my shirt in. He rubbed his stomach and stated that he was more pregnant than me, and if he can tuck his shirt in then I should be able to tuck my shirt in.

On October 2, 2007 I went to a doctor's appointment and was placed on bed rest until October 8, 2007. On October 8, 2007 Mr. Hopkins stated that they had to let me go because of the cash issue that took place in September 2007. I believe my discharge was a pretext to get rid of me because of my pregnancy.

I believe that I was discriminated against because of my gender/pregnancy in violation of Title VII of the Civil Rights Act of 1964 as amended and the Nevada State Laws.

I want this charge filed with both the EEOC and the State or local Agency, if any. I will advise the agencies if I change my address or phone number and I will cooperate fully with them in the processing of my charge in accordance with their procedures.

NOTARY - When necessary for State and Local Agency Requirements

I declare under penalty of perjury that the above is true and correct.

I swear or affirm that I have read the above charge and that it is true to the best of my knowledge, information and belief.

SIGNATURE OF COMPLAINANT

*Katie McClifford*

SUBSCRIBED AND SWORN TO BEFORE ME THIS DATE  
(month, day, year)

*3/4/08*

Date

*Katie McClifford*

Charging Party Signature

EEOC Form 161 (2/08)

## U.S. EQUAL EMPLOYMENT OPPORTUNITY COMMISSION

## DISMISSAL AND NOTICE OF RIGHTS

0305-08-01606  
3/09

To: Katie Clifford  
8555 W Russell Rd # 2080  
Las Vegas, NV 89113

From: Los Angeles District Office  
255 E. Temple St. 4th  
Los Angeles, CA 90012



On behalf of person(s) aggrieved whose identity is  
CONFIDENTIAL (29 CFR §1601.7(a))

EEOC Charge No.

EEOC Representative

Telephone No.

34B-2008-00783

Sara M. Aguirre,  
State & Local Coordinator

(213) 894-1100

## THE EEOC IS CLOSING ITS FILE ON THIS CHARGE FOR THE FOLLOWING REASON:



The facts alleged in the charge fail to state a claim under any of the statutes enforced by the EEOC.



Your allegations did not involve a disability as defined by the Americans With Disabilities Act.



The Respondent employs less than the required number of employees or is not otherwise covered by the statutes.



Your charge was not timely filed with EEOC; in other words, you waited too long after the date(s) of the alleged discrimination to file your charge



The EEOC issues the following determination: Based upon its investigation, the EEOC is unable to conclude that the information obtained establishes violations of the statutes. This does not certify that the respondent is in compliance with the statutes. No finding is made as to any other issues that might be construed as having been raised by this charge.



The EEOC has adopted the findings of the state or local fair employment practices agency that investigated this charge.



Other (briefly state)

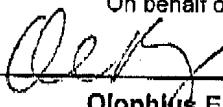
## - NOTICE OF SUIT RIGHTS -

(See the additional information attached to this form.)

**Title VII, the Americans with Disabilities Act, and/or the Age Discrimination in Employment Act:** This will be the only notice of dismissal and of your right to sue that we will send you. You may file a lawsuit against the respondent(s) under federal law based on this charge in federal or state court. Your lawsuit **must be filed WITHIN 90 DAYS** of your receipt of this notice; or your right to sue based on this charge will be lost. (The time limit for filing suit based on a state claim may be different.)

**Equal Pay Act (EPA):** EPA suits must be filed in federal or state court within 2 years (3 years for willful violations) of the alleged EPA underpayment. This means that **backpay due for any violations that occurred more than 2 years (3 years) before you file suit may not be collectible.**

On behalf of the Commission



Olophus E. Perry,  
District Director

July 29, 2009

(Date Mailed)

Enclosures(s)

cc: DOLLAR RENT A CAR/THRIFTY RENT A CAR  
7135 Gilesple St  
Las Vegas, NV 89119

Richard Segerblom  
704 S. 9th Street  
Las Vegas, NV 89101